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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GEOVANY SERRANO, IGNACIO GAONA, JUAN CARLOS
MARTINEZ, RAUL POLANCO, HIPOLITO R. RIVAS, JOSE
L. RODRIGUEZ RIVAS and JOSE WILMER RIVAS,
individually and on behalf of all others similarly situated,

Case No.: 12-CV-6374 (LTS)

Plaintiffs,

- against -

MAMAI'S CONTRACTING CORP., THE TRUSTEES OF
COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK,
STAVROULA MAMAI'S-LORINO, PETER MAMAI'S, CHRIS
TRIATOS and ANDREAS STEFANAKIS,

Defendants.

**NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENT, NAMED PLAINTIFFS' SERVICE AWARDS, AND CLASS
COUNSEL'S ATTORNEYS FEES AND EXPENSES**

PLEASE TAKE NOTICE that upon (i) the Declaration of Steven J. Moser dated December 23, 2013 and the exhibits annexed to thereto, (ii) the Declaration of Linda Mocerino dated December 18, 2013 and the exhibits annexed thereto, (iii) the Declarations of Geovany Serrano, Ignacio Gaona, Juan Carlos Martinez, Raul Polanco, Hipolito R. Rivas, José L. Rodriguez Rivas and José Wilmer Rivas all dated December 8, 2013, and (iv) the accompanying Memorandum of Law, Plaintiffs will, at the fairness hearing at 2:00 p.m. on January 10, 2014, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, in Courtroom 17C, move this Honorable Court for an order:

- (1) granting final approval of the class action settlement and the settlement agreement annexed hereto as Exhibit A;
- (2) approving an incentive award in an amount up to \$25,000.00 for the Plaintiff Geovany Serrano;

- (3) approving incentive awards of up to \$20,000.00 for the Plaintiffs Ignacio Gaona, Juan Carlos Martinez, Raul Polanco, Hipolito R. Rivas, José L. Rodriguez Rivas and José Wilmer Rivas;
- (4) approving and awarding Class Counsel's attorney's fees in the sum of \$255,000.00;
- (5) approving and awarding Class Counsel's request for reimbursement of costs and disbursements in the sum of \$14,105.41.

Plaintiffs submit a Proposed Order for the Court's convenience annexed hereto as Exhibit B.

Dated: Glen Cove, New York
December 26, 2013

Respectfully submitted,
STEVEN J. MOSER, P.C.



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